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Ex Parte

February 4, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, TWA 235
445 12th Street, S.W., Room
Washington, D.C. 20054

Re: CC Docket No. 92-237

Dear Ms. Salas:

Today, James U. Troup and the undersigned, on behalf of Iowa Network Services, Inc., ("INS") met with Yog Varma, Blaise Scinto, and David Ward of the Common Carrier Bureau to discuss INS's need for an additional carrier identification code. The attached material was left with the Commission staff members.

Please place a copy of this letter and the attachment in the record in the above-captioned proceeding. Acknowledgment and date of receipt of this letter are requested. A duplicate letter is attached for this purpose.

Very truly yours,



Arter & Hadden L.L.P.
by Robert H. Jackson

Enclosure

cc: Yog Varma
INS92237xp.doc

Blaise Scinto

David Ward

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List A B C D E

***Administration of the North American Numbering
Plan, Carrier Identification Codes***

CC Docket No. 92-237

Iowa Network Services, Inc.

Ex Parte Presentation to the

Common Carrier Bureau

February 4, 1999

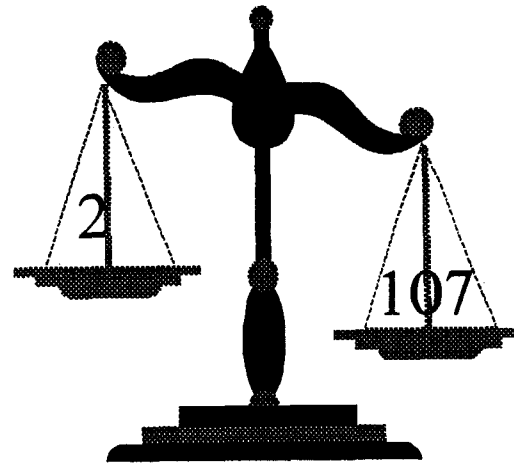
- Iowa Network Services (“INS”) offers access services, along with intrastate, interstate, and international toll services, in conjunction with 138 small Iowa LECs in 300 exchanges, to approximately 235,000 customers throughout rural Iowa
 - INS was formed by many of Iowa’s small LECs to provide centralized interLATA and intraLATA equal access
 - INS serves rural Iowa with two tandem switches and redundant fiber rings
 - INS currently has two Feature Group D (“FGD”) CICs, which are used to provide various services to Iowa customers

- US WEST will finally provide 1+ intraLATA equal access in Iowa during 1999 as required by the Telecommunications Act of 1996
- INS plans to offer intraLATA long distance services to customers in US WEST exchanges
 - 1+ intraLATA dialing could bring price competition to customers in US WEST's exchanges
 - US WEST's current intrastate, intraLATA toll rates for an initial minute (daytime) range from 21-to-38 cents
 - INS requires an additional CIC to compete with US WEST for intraLATA toll & has requested a CIC from NANPA

- NANPA declined INS's request for an additional CIC because of the FCC's continuing prohibition against NANPA's assignment of more than two CICs to any carrier
 - The industry's guidelines would allow INS to have as many as six CICs
- The FCC's nearly four-year-old CIC assignment restrictions are a barrier to INS's market entry
- Large carriers can circumvent the FCC's CIC assignment restrictions
 - All CICs obtained when one carrier purchases or merges with other carriers are exempt from the FCC's restrictions
 - MCI Worldcom has 107 CICs according to NANPA's data

The status quo is unfair to INS and other small carriers

- “The FCC shall . . . make . . . numbers available on an equitable basis.” *47 U.S.C. sec. 251(e)(1)*
- Carriers with with a greater number of CICs at their disposal can have a competitive advantage over other carriers.
FNPRM, CC Docket No. 92-237, FCC 97-364, at par. 36.



- CIC assignments from NANPA have been restricted since March 1995
- The FCC's FNPRM, FCC 97-364, has been pending since October 1997
- The report and recommendations of the North American Numbering Council on CICs has been on file with the FCC since February 1998
- The conversion from three-digit to four-digit CICs has been generally complete since June 1998

- Carriers with only two CICs need relief in the first quarter of 1999, not several years from now
 - The FCC should release its report and order in this rulemaking proceeding as soon as possible
 - The FCC should immediately grant emergency relief to INS and other carriers that have only two CICs and that plan to offer toll services in those intraLATA markets that are finally being opened to equal access as required by the Telecommunications Act of 1996